

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In re:

The Archdiocese of Saint Paul and Minneapolis,

Bankruptcy Case No. 15-30125

Debtor.

Chapter 11 Case

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**ORDER ESTABLISHING DEADLINES FOR FILING PROOFS OF CLAIM;  
APPROVING PROOF OF CLAIM FORMS; APPROVING FORM AND MANNER OF  
NOTICE; AND APPROVING CONFIDENTIALITY PROCEDURE**

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The case came before the court on the motion of the Archdiocese of Saint Paul and Minneapolis for an order establishing deadlines for filing proofs of claim, approving proof of claim forms, approving the form and manner of notice, and approving confidentiality procedures in connection with the filing of proofs of claim.

Based on the motion and the file,

**IT IS ORDERED:**

1. The Archdiocese's motion for an order establishing deadlines for filing proofs of claim, approving proof of claim forms, approving the form and manner of notice, and approving confidentiality procedures in connection with the filing of proofs of claim is granted as set forth in this order.

**FORMS**

2. The Sexual Abuse Proof of Claim Form, the Non-Tort Filing Deadline Notice, the Sexual Abuse Claims Filing Deadline Notice and the Publication Notice, in the forms attached as Exhibits A, B, C, and D are approved. Creditors with claims other than sexual abuse claims may use the official proof of claim form B10.

### **NOTICE**

3. The form and manner of notice as approved in this order fulfill the notice requirements of the Federal Rules of Bankruptcy Procedure and the local rules of this court. Notice of the filing deadlines in the form and manner attached is fair and reasonable and will provide sufficient notice to all creditors of their rights and obligations in connection with claims they may assert in this case. Accordingly, the Archdiocese is authorized and directed to serve and publish the notices in the manner described in this order.

### **DEADLINE FOR TIMELY FILING CLAIMS**

4. The last day to timely file a proof of claim in this case is set as **August 3, 2015**.

### **REQUIREMENTS FOR SEXUAL ABUSE PROOF OF CLAIM FORMS**

5. Persons asserting claims arising from sexual abuse as that term is defined in Minnesota Statutes § 541.073(1), as well as from molestation, rape, undue familiarity, sexually-related physical, psychological or emotional harm, or contacts or interactions of a sexual nature between a child and an adult, or a non-consenting adult and another adult for which such persons believe that the Archdiocese may be shall file a Sexual Abuse Proof of Claim Form (Ex. A).

6. The Clerk of Court shall maintain a copy of each Sexual Abuse Proof of Claim Form in electronic form in accordance with the confidentiality procedures outlined below. The Clerk of Court will assign each Sexual Abuse Proof of Claim Form a number and shall list that number on the public docket without a link to the Sexual Abuse Proof of Claim Form and without the name of the claimant. All original Sexual Abuse Proof of Claim Forms shall be turned over to the attorneys for the Archdiocese at regular intervals.

## **CONFIDENTIALITY PROCEDURES**

7. Sexual Abuse Proof of Claim Forms shall be submitted pursuant to the following confidentiality procedures:

(i) Sexual Abuse Claimants shall mail or deliver the original of a Sexual Abuse Proof of Claim Form to the Clerk of the United States Bankruptcy Court for the District of Minnesota, Attention B. Montez at the following address: 200 Warren E. Burger Federal Building and United States Courthouse, 316 N. Robert Street, Saint Paul, Minnesota 55101.

(ii) Sexual Abuse Proof of Claim Forms maintained by the Clerk of Court will not be available for viewing or copying unless otherwise ordered by the court. This confidentiality procedure is for the benefit of the Sexual Abuse Claimants. Accordingly, Sexual Abuse Claimants may elect to make any of the information contained in a Sexual Abuse Proof of Claim Form public, even if they elected to file the Sexual Abuse Proof of Claim Form confidentially. If a Sexual Abuse Claimant affirmatively indicates by checking the box in Part 1 of the Sexual Abuse Proof of Claim Form that the claim is to be made public, that claim will be added to the public claims register. If no box is checked or if both boxes are checked on a Sexual Abuse Proof of Claim Form, that form shall not be made public.

(iii) Sexual Abuse Proof of Claim Forms submitted by Sexual Abuse Claimants shall be held and treated as confidential by the Archdiocese and its counsel and upon request to the permitted parties listed below, subject to each permitted party executing and returning to the Archdiocese's counsel a confidentiality agreement, and to such other persons as the court determines; provided, however, that all parties with access to the Sexual Abuse Proof of Claim Forms shall agree to keep the information provided in a Sexual Abuse Proof of Claim Form confidential (unless the Sexual Abuse Claimant elects otherwise in Part 1 of the Sexual Abuse Proof of Claim Form). Permitted Parties may obtain copies of Sexual Abuse Proof of Claim Forms in accordance with the terms of an applicable confidentiality agreement only from counsel for the Archdiocese, and shall not seek or obtain such documents from the clerk of court.

(iv) Permitted parties include: (a) counsel for the Archdiocese; (b) officers and employers of the Archdiocese who are necessary to assist the Archdiocese and its counsel address issues with respect to Sexual Abuse Claims; (c) counsel for the committee of unsecured creditors; (d) insurance companies or their successors, including any authorized claim administrators of such insurance companies, that issued or allegedly issued policies to the Archdiocese and their reinsurers and attorneys; (e) any future claims representative appointed by the court in this case; (f) any mediator, special arbitrator or claims reviewer appointed by the court, including Judge Arthur Boylan, to review and resolve the

Sexual Abuse Claims; (g) any trustee appointed to administer payments to Sexual Abuse Claimants; (h) authorized representatives of a department of corrections with respect to a Sexual Abuse Claim by a Sexual Abuse Claimant who is incarcerated but only to the extent such disclosure is authorized under applicable non-bankruptcy law; (i) members of the committee of unsecured creditors and their personal counsel (after the Sexual Abuse Proof of Claim Form has been redacted to remove the Sexual Abuse Claimant's name, address and any other information identified in Part 2(A) or 3 of the Sexual Abuse Proof of Claim Form and the signature block); (j) law enforcement in the city or county where the Sexual Abuse Claim arose; (k) auditors of the United States Conference of Catholic Bishops charged with preparing annual audits of Archdiocesan compliance with the Charter for the Protection of Children and Young People; and (l) such other persons as the court determines should have the information in order to evaluate Sexual Abuse Claims only upon a motion by the Archdiocese or the committee of unsecured creditors.

8. Permitted parties and their attorneys shall be authorized to review proofs of claim upon execution of a confidentiality agreement agreed upon by the Archdiocese and the committee of unsecured creditors or pursuant to further order of the court. The court may approve additional permitted parties upon motion.

9. Access to the Sexual Abuse Proof of Claim Forms extends only to the individual who executes the confidentiality agreement. A separate confidential agreement must be signed by each individual who seeks access to the records on behalf of a permitted party.

#### **TIMING AND FORM OF NOTICE**

10. As soon as reasonably practicable after the entry of this order, the Clerk of Court shall give notice by United States mail, first-class postage prepaid, or by electronic means, the Non-Tort Claim Filing Deadline Notice (Ex. B) to (a) the United States Trustee for the District of Minnesota; (b) counsel to the committee of unsecured creditors; (c) all persons and entities that have filed a notice of appearance in this case; (d) all persons and entities included in the creditor mailing matrix on file in this case; and (e) all persons and entities that have previously filed proofs of claims in this Chapter 11 case. The Non-Tort Filing Deadline Notice, the Publication

Notice, and the Sexual Abuse Claim Filing Deadline Notice shall include a reference to this court's website ([www.mnb.uscourts.gov](http://www.mnb.uscourts.gov)) where all claim forms shall be made available.

11. As soon as reasonably practicable, but in any event no later than five business days after the entry of this order, the Archdiocese shall serve by United States mail, first-class postage prepaid, the Sexual Abuse Claim Filing Deadline Notice (Ex. C) and the Sexual Abuse Proof of Claim Form (Ex. A) on the United States Trustee, and on known Sexual Abuse Claimants who have:

(i) Filed pending lawsuits against the Archdiocese alleging that they were sexually abused by employees or agents of the Archdiocese or by clergy previously assigned to the Archdiocese or any others for whom the Archdiocese may be liable;

(ii) Provided to the Archdiocese under Minn. Stat. § 549.09 a written notice of claim of sexual abuse by employees or agents of the Archdiocese or by clergy previously assigned to the Archdiocese or any others for whom the Archdiocese may be liable;

(iii) Contacted the Archdiocese to claim that they were sexually abused as a minor by employees or agents of the Archdiocese or by clergy previously assigned to the Archdiocese or any others for whom the Archdiocese may be liable;

(iv) Are otherwise known to the Archdiocese to be a Sexual Abuse Claimant through reasonably-ascertainable records.

12. The service of the Sexual Abuse Claim Filing Deadline Notice and Sexual Abuse Proof of Claim Form on Sexual Abuse Claimants shall be accomplished through such Sexual Abuse Claimants' attorneys, if previously identified as counsel for such Sexual Abuse Claimant in connection with a Sexual Abuse Claim, and directly on all other known potential Sexual Abuse Claimants that have been identified and located by the Archdiocese through reasonably diligent efforts.

13. The service outlined above shall constitute service on all known creditors of the Archdiocese. All other creditors of the Archdiocese shall be deemed to be unknown for the purpose of service of notice of the Claim Filing Deadline.

14. The Archdiocese shall also provide notice of the Claim Filing Deadline established in this order by causing a copy of the Publication Notice (Ex. D) to be published as follows:

(i) Publication four times in each of the following publications, with the first publication to occur within two weeks of the service of the claim filing deadline packages, the second publication to occur approximately three weeks after the first notice, the third publication to occur approximately three weeks after the second notice, and the fourth publication to occur approximately three weeks after the third notice:

- *National Publication:* USA Today – National Edition
- *Catholic Publications (and their respective websites):*
  - National Catholic Reporter (National)
  - The National Catholic Register (National)
  - Catholic Spirit (Regional)
- *Local Publications (and their respective websites):*
  - Minneapolis Star Tribune
  - St. Paul Pioneer Press
  - The Minnesota Daily
  - Finance and Commerce
  - Duluth News Tribune
  - Post-Bulletin (Rochester)
  - St. Cloud Times
  - Brainerd Dispatch
  - Grand Forks Herald
  - Winona Daily News
  - Daily Journal (Fergus Falls)
  - Sentinel (Fairmont)
  - The Bemidji Pioneer
  - Crookston Daily News
  - The Free Press (Mankato)
  - Faribault Daily News
  - The Journal (New Ulm)
  - La Prensa de Minnesota (Spanish Language)

- Hmong Times

(ii) In addition to the Publication Notice, the Archdiocese will send copies of the Sexual Abuse Claim Filing Deadline Notice to the publications listed above and to the following:

- The Associated Press of Minnesota
- WCCO-AM
- Minnesota Public Radio
- KARE - TV
- KMSP - TV
- KSPR - TV
- WCCO - TV
- Each diocese in Minnesota

15. The Archdiocese shall provide further notice of the Claim Filing Deadline by taking the following measures:

(i) Within 3 business days of the entry of this order, the Archdiocese will post the component parts of the Sexual Abuse Claim Filing Deadline Package and the Non-Tort Claim Filing Deadline Package on the following public website: <http://www.archspm.org/>;

(ii) Within 3 business days of the entry of this order, the Archdiocese will provide a copy of the Publication Notice and component parts of the Sexual Abuse Claim Filing Deadline Package to the Survivors Network of the Abused by Priests and request that it post the same on its website at [www.snapnetwork.org](http://www.snapnetwork.org);

(iii) Within 3 business days of the entry of this order, the Archdiocese will provide a copy of the Publication Notice and component parts of the Sexual Abuse Claim Filing Deadline Package to Jeff Anderson and Associates P.A. and the Noaker Law Firm LLC and request that they post the same on their respective websites at [www.andersonadvocates.com](http://www.andersonadvocates.com) and <http://noakerlaw.com/>;

(iv) The Archdiocese will maintain a toll free number which may be used by Sexual Abuse Claimants to ask questions or obtain copies of the Sexual Abuse Claim Filing Deadline Package or parts thereof;

(v) Within two weeks of the service of the Sexual Abuse Claim Filing Deadline Package, the Archdiocese will provide a copy of the Publication Notice and the Sexual Abuse Claim Filing Deadline Notice to the following offices/entities and request that each recipient publicly post such notice until the expiration of the Claim Filing Deadline: (a) the Minnesota Attorney General; (b) the district attorney, the county court administrator, and sheriff's department for each of the 12 counties comprising the Region as defined in the Affidavit of the

Charles V. Lachowitzer; (c) the Minnesota Department of Health's three locations in the Region; (d) each hospital in the Region; and (e) each of the 187 parishes within the Region.

(vi) The Archdiocese will send a letter to each parish and Catholic high school in the Region requesting that such parish or Catholic high school display the Publication Notice and Sexual Abuse Claim Filing Deadline Notice in a prominent location within the church or school. The letter will also request that the notices be published once a month in the parishes' weekly bulletins until the Claim Filing Deadline. The letter will also request that each pastor, canonical administrator, or parochial vicar remind parishioners of the availability of information concerning the Claim Filing Deadline. The letter will also request that parishes disseminate the Publication Notice and Sexual Abuse Claim Filing Deadline Notice by email to their respective distribution lists. Finally, the letter will request each Catholic high school at which a clergy member against whom a substantiated claim of sexual abuse has been made had worked to draft a letter to alumni providing notice of the case and Claim Filing Deadline.

(vii) The Archdiocese will mail a copy of the Sexual Abuse Claim Filing Deadline Notice to all licensed alcohol and addiction treatment centers in the state of Minnesota, as identified by counsel for the committee of unsecured creditors, and to: (1) persons identified by counsel for the official committee of unsecured creditors as licensed therapists presently working with sexual abuse claimants; and (2) persons identified in claimant questionnaires completed as of April 15, 2015 that identify providers of counseling or other treatment services to sexual abuse claimants.

(viii) The Archdiocese will post copies of the Sexual Abuse Claim Filing Deadline Notice and Sexual Abuse Proof of Claim Form in Spanish and Hmong translations on its website at <http://information.archspm.org/> and will send copies of the same documents to the Bankruptcy Clerk of Court to be posted on the website of the Bankruptcy Court for the District of Minnesota at <http://www.mnb.uscourts.gov>.

16. Each request described in paragraph 15 (v) and (vi) above shall be on the Archdiocese's letterhead and signed by an officer of the Archdiocese. The request shall include a space at the bottom for the recipient to indicate whether it will comply with the request and a stamped self-addressed return envelope. The Archdiocese will report on compliance to the committee of unsecured creditors.



17. In addition, the Clerk of Court shall post the Non-Tort Proof of Claim Form, the Sexual Abuse Proof of Claim Form, the Non-Tort Filing Deadline Notice, the Sexual Abuse Claims Filing Deadline Notice and the Publication Notice on the website for the United States Bankruptcy Court for the District of Minnesota by adding a link on the court's home page ([www.mnb.uscourts.gov](http://www.mnb.uscourts.gov)) to easily access filing deadline information.

Dated: *April 17, 2015*

/s/ Robert J. Kressel

Robert J. Kressel  
United States Bankruptcy Judge

**Exhibit A – Sexual Abuse Proof of Claim Form**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In re:

The Archdiocese of Saint Paul and Minneapolis,

Bankruptcy Case No. 15-30125

Debtor.

Chapter 11 Case

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**SEXUAL ABUSE PROOF OF CLAIM**

**IMPORTANT:**  
**THIS FORM MUST BE RECEIVED NO LATER THAN**  
**AUGUST 3, 2015**

Carefully read the instructions included with this SEXUAL ABUSE PROOF OF CLAIM and complete ALL applicable questions. Please print clearly and use blue or black ink. Send the **original** to the U.S. Bankruptcy Court Clerk at the following address: Office of the Clerk of Court, Attention B. Montez, U.S. Bankruptcy Court District of Minnesota, 200 Warren E. Burger Federal Building and United States Courthouse, 316 North Robert Street, Saint Paul, MN 55101.

**THIS PROOF OF CLAIM IS FOR CLAIMANTS OF SEXUAL ABUSE ONLY.  
YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER.**

A sexual abuse claim includes any claim arising from sexual abuse as that term is defined in Minnesota Statutes § 541.073(1), as well as from molestation, rape, undue familiarity, sexually-related physical, psychological or emotional harm, or contacts or interactions of a sexual nature between a child and an adult, or a non-consenting adult and another adult for which such persons believe that the Archdiocese may be liable.

**TO BE VALID, THIS PROOF OF CLAIM MUST BE SIGNED BY YOU OR YOUR ATTORNEY. IF THE SEXUAL ABUSE CLAIMANT IS DECEASED OR INCAPACITATED, THE FORM MAY BE SIGNED BY THE SEXUAL ABUSE CLAIMANT'S REPRESENTATIVE OR THE ATTORNEY FOR THE ESTATE. IF THE SEXUAL ABUSE CLAIMANT IS A MINOR, THE FORM MAY BE SIGNED BY THE SEXUAL ABUSE CLAIMANT'S PARENT OR LEGAL GUARDIAN, OR THE SEXUAL ABUSE CLAIMANT'S ATTORNEY. IF THE SEXUAL ABUSE CLAIMANT DIES AFTER THE SUBMISSION OF THIS FORM, BUT BEFORE THE CLAIM IS RESOLVED, NOTIFICATION OF THE DEATH MUST BE PROVIDED TO THE COURT AT THE ADDRESS ABOVE.**

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to five years, or both. 18 U.S.C. §§ 152 and 3571.

**UNLESS YOU INDICATE OTHERWISE IN PART 1 BELOW, YOUR IDENTITY WILL BE KEPT STRICTLY CONFIDENTIAL, UNDER SEAL, AND OUTSIDE THE PUBLIC RECORD. HOWEVER, INFORMATION IN THIS CLAIM WILL BE PROVIDED PURSUANT TO COURT-APPROVED CONFIDENTIAL GUIDELINES TO COUNSEL FOR THE COMMITTEE OF UNSECURED CREDITORS, AND OTHER COURT-APPROVED THIRD PARTIES IN ORDER TO EVALUATE THE CLAIM.**

**YOUR PROOF OF CLAIM MAY BE DISPUTED OR HONORED IN WHOLE OR IN PART. THE DEBTOR RESERVES THE RIGHT TO OBJECT OR TO ASSERT OFFSETS OR DEFENSES AGAINST ANY FILED PROOF OF CLAIM FORM**

**PART 1: CONFIDENTIALITY**

**THIS SEXUAL ABUSE PROOF OF CLAIM (ALONG WITH ANY ACCOMPANYING EXHIBITS AND ATTACHMENTS) WILL BE MAINTAINED AS CONFIDENTIAL UNLESS YOU EXPRESSLY REQUEST THAT IT BE PUBLICLY AVAILABLE BY CHECKING THE BOX AND SIGNING BELOW.**

- ☐ I want my Proof of Claim (along with any accompanying exhibits and attachments) to be kept **confidential**.
- ☐ I want my Proof of Claim (along with any accompanying exhibits and attachments) to be made **public**.

Please verify this election by signing directly below.

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

**PART 2: IDENTIFYING INFORMATION**

**A. Sexual Abuse Claimant**

First Name	Middle Initial	Last Name	Jr/Sr/III
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Mailing Address (If Party is incapacitated, is a minor or is deceased, please provide the address of the individual submitting the claim. If you are in jail or prison, your current address.)

City	State/Prov.	Zip Code (Postal Code)	Country (if other than USA)
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Telephone No(s):

Home: \_\_\_\_\_ Work: \_\_\_\_\_ Cell: \_\_\_\_\_

Email address: \_\_\_\_\_

If you are in jail or prison, your identification number: \_\_\_\_\_

May we leave voicemails for you regarding your claim: ☐ Yes ☐ No

May we send confidential information to your email: ☐ Yes ☐ No

Birth Date: \_\_\_\_\_ ☐ Male ☐ Female  
Month Day Year

Last Four Digits of Social Security Number: XXX-XX-\_\_\_\_

Any other name(s) or alias(es) by which the Sexual Abuse Claimant has been known: \_\_\_\_\_

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**B. Sexual Abuse Claimant's Attorney (if any. Do not list counsel for the Debtors or the Official Creditors Committee):**

\_\_\_\_\_  
Law Firm Name

\_\_\_\_\_  
Attorney's First Name

\_\_\_\_\_  
Middle Initial

\_\_\_\_\_  
Last Name

\_\_\_\_\_  
Street Address

\_\_\_\_\_  
City

\_\_\_\_\_  
State/Prov.

\_\_\_\_\_  
Zip Code (Postal Code)

\_\_\_\_\_  
Country  
(if other than USA)

\_\_\_\_\_  
Telephone No.

\_\_\_\_\_  
Fax No.

\_\_\_\_\_  
E-mail address

**PART 3: BACKGROUND INFORMATION**

1. Are you currently married?

☐ Yes ☐ No (If "Yes," please identify the name of your spouse and marriage date.)

2. Have you previously been married?

☐ Yes ☐ No (If "Yes," please identify your former spouse and, as applicable, the date(s) of any dissolution, divorce, separation or widowhood.)

3. Do you have children?

☐ Yes ☐ No (If "Yes," please identify their names and birthdates. If any children have died, please provide their date of death.)

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4. What schools have you attended? For each school, please identify the months and years of your attendance. If you cannot recall the exact months when you began or ended each school year, please identify the season (fall, winter, spring, summer).

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5. Have you received a diploma or degree from any of the schools listed above?

☐ Yes ☐ No (If "Yes," please identify each diploma or degree that you received and the year you received it.)

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6. Have you served in the armed forces?

☐ Yes ☐ No (If "Yes," please identify the branch of service, the dates you served and, if you have been discharged, the type of discharge you received.)

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7. Are you currently employed?

☐ Yes ☐ No (If "Yes," please identify the name of the organization where you are employed, the date that your employment began and your job title.)

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8. What is your employment history? Please provide the following information about each place you have previously been employed: (i) the name of the organization where you

were employed; (ii) the dates of employment; (iii) your job title(s); and (iv) your reason for leaving the place of employment.

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9. Have you been self-employed?

☐ Yes ☐ No (If “Yes,” please provide your job responsibilities and any business name you used. Please also provide the dates of this business.)

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10. Are you retired?

☐ Yes ☐ No (If “Yes,” when did you retire?)

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11. Part 4 below will ask you about the nature of your complaint against the Archdiocese of Saint Paul and Minneapolis. Other than the incident(s) of sexual abuse described in Part 4, have you ever been sexually abused by anyone else? If “Yes,” please describe this abuse, including the date of the abuse and the identity of the abuser.

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**PART 4: NATURE OF ABUSE**

(Attach additional separate sheets if necessary)

**NOTE: IF YOU HAVE PREVIOUSLY FILED A LAWSUIT AGAINST THE DEBTOR IN STATE OR FEDERAL COURT, YOU MAY ATTACH THE COMPLAINT. IF YOU DID NOT FILE A LAWSUIT, OR IF THE COMPLAINT DOES NOT CONTAIN**

**ALL OF THE INFORMATION REQUESTED BELOW, YOU MUST PROVIDE THE INFORMATION BELOW.**

1. Who committed each act of sexual abuse?

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2. What is the position, title or relationship to you of the abuser or individual who committed these acts?

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3. Where did the sexual abuse take place? Please be specific and complete all relevant information that you know, including the City and State, name of the parish, school (if applicable) and/or the names of any other location.

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4. When did the sexual abuse take place?

- a. Please be as specific as possible. If you can, please indicate the day, month and year. If you cannot recall the month, please try to recall the season of year (fall, winter, spring summer).

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- b. If you were sexually abused on more than one occasion, please state when the abuse started, when it stopped, and how many times it occurred.

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- c. Please also state your age(s) and your grade(s) in school (if applicable) at the time the abuse took place.



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5. Please describe in as much detail as possible the nature of the sexual abuse. What happened?

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6. Did you tell anyone about the sexual abuse (this would include parents, relatives, friends, the Archdiocese of Saint Paul and Minneapolis, attorneys, counselors, and law enforcement authorities)? \_\_\_\_\_

- a. If "Yes," who did you tell? Please list the name(s) and any contact information you have.

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- b. What did you say?

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- c. When did you tell this person or persons about the abuse?

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- d. If you know, what did the person or persons do in response?

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7. Were there any witnesses? If so, please list their name(s) and any contact information you have, including addresses.

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8. Do you personally know or have reason to believe that the Archdiocese of Saint Paul and Minneapolis knew that your abuser was abusing you or others before or during the period when such abuse occurred? If "Yes", please provide all information that supports your conclusion, including the information requested in items 8(a) through 8(e) below.

- a. Who at the Archdiocese knew that your abuser was abusing you or others?

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- b. How did such person or persons at the Archdiocese learn this information? For example, did you report the abuse to someone from the Archdiocese? Did someone else tell you they reported it to someone from the Archdiocese? Did someone from the Archdiocese witness the abuse?

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- c. When did such person or persons at the Archdiocese learn this information?

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- d. What exactly was the person or persons from the Archdiocese told or what exactly did they observe?

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- \_\_\_\_\_
- \_\_\_\_\_
- e. How did you come to have the information you provided in response to the questions above?

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**PART 5: IMPACT OF ABUSE**

(Attach additional separate sheets if necessary)

1. What injuries have occurred to you because of the act or acts of sexual abuse that resulted in the claim (for example, the effect on your education, employment, personal relationships, health, and any physical injuries)? \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
2. Have you sought counseling or other treatment for your injuries? If so, with whom and when? \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

**PART 6: ADDITIONAL INFORMATION**

1. Prior Non-Bankruptcy Claims: Have you previously filed any lawsuit seeking damages for the sexual abuse described in this claim? ☐ Yes ☐ No (If "Yes" please answer the questions below.)
- a. Where and when did you file the lawsuit?
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- b. Who were the parties to the lawsuit and what was the case number?
- \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
c. What was the result of that lawsuit?

\_\_\_\_\_  
\_\_\_\_\_  
2. Prior Bankruptcy Claims: Have you filed any claims in any other bankruptcy case relating to the sexual abuse described in this claim?

☐ Yes ☐ No (If "Yes," you are required to attach a copy of any completed claim form.)

\_\_\_\_\_  
3. Any Settlements: Regardless of whether a complaint was ever filed against any party because of the sexual abuse, have you settled any claim or demand relating to the sexual abuse described in this claim?

☐ Yes ☐ No (If "Yes," please describe, including parties to the settlement. You are required to attach a copy of any settlement agreement.) \_\_\_\_\_

\_\_\_\_\_  
4. Bankruptcy: Have you ever filed bankruptcy? ☐ Yes ☐ No (If "Yes," please provide the following information:

Name of Case: \_\_\_\_\_ Court: \_\_\_\_\_

Date Filed: \_\_\_\_\_ Case No.: \_\_\_\_\_

Chapter: ☐ 7 ☐ 11 ☐ 12 ☐ 13 Name of Trustee: \_\_\_\_\_

Date: \_\_\_\_\_

**Sign and print your name. If you are signing the claim on behalf of another person or an estate, print your title.**

**Under penalty of perjury, I declare the foregoing statements to be true and correct.**

**Signature:** \_\_\_\_\_

**Print Name:** \_\_\_\_\_

**Title:** \_\_\_\_\_

**Exhibit B – Non-Tort Claim Filing Deadline Notice**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In re:

The Archdiocese of Saint Paul and Minneapolis,

Bankruptcy Case No. 15-30125

Debtor.

Chapter 11 Case

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**NOTICE OF THE TIME FOR TIMELY FILING PROOFS OF CLAIM**

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST THE ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS:

**PLEASE TAKE NOTICE** that on January 16, 2015 The Archdiocese of Saint Paul and Minneapolis filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code in the United States Bankruptcy Court for the District of Minnesota. The debtor's address, the case number, proof of claim forms and other relevant information related to this Chapter 11 case may be obtained at: <http://information.archspm.org/>.

**PLEASE TAKE FURTHER NOTICE** that except as described below, all persons, entities, or governmental units that have or assert any pre-petition claims against the debtor must file a proof of claim with the Clerk of Bankruptcy Court at the following address: Clerk of Court, U.S. Bankruptcy Court, District of Minnesota, 200 Warren E. Burger Federal Building and United States Courthouse, 316 North Robert Street, St. Paul, MN 55101, so that the proof of claim is received by the Clerk of Court on or before **August 3, 2015**.

**PLEASE TAKE FURTHER NOTICE** that the Non-Tort Proof of Claim Form may be obtained at: <http://information.archspm.org/> or <http://www.mnb.uscourts.gov>.

**YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS,  
INCLUDING WHETHER YOU MUST FILE A PROOF OF CLAIM**

Dated:

**Exhibit C – Sexual Abuse Claim Filing Deadline Notice**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In re:

The Archdiocese of Saint Paul and Minneapolis,

Bankruptcy Case No. 15-30125

Debtor.

Chapter 11 Case

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**NOTICE OF TIME FOR TIMELY FILING CLAIMS  
RELATING TO, OR ARISING FROM, SEXUAL ABUSE**

**THIS IS AN IMPORTANT NOTICE.  
YOUR RIGHTS MIGHT BE AFFECTED.**

**TO ALL PERSONS WITH CLAIMS ARISING FROM SEXUAL ABUSE FOR WHICH  
THE ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS MAY BE LIABLE:**

**AUGUST 3, 2015 IS THE LAST DATE TO TIMELY FILE PROOFS OF CLAIMS FOR  
SEXUAL ABUSE**

On January 16, 2015 The Archdiocese of Saint Paul and Minneapolis filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code in the United States Bankruptcy Court for the District of Minnesota. The debtor's address, the case number, proof of claim forms and other relevant information related to this Chapter 11 case may be obtained at <http://information.archspm.org/>. Individuals have asserted sexual abuse claims against the Archdiocese, on account of alleged actions by people associated with the Archdiocese. Any person who believes that he or she has, or may have, a claim arising from sexual abuse as that term is defined in Minnesota Statutes §541.073(1), molestation, rape, undue familiarity, sexually-related physical, psychological or emotional harm, or contacts or interactions of a sexual nature between a child and an adult, or a non-consenting adult and another adult for which such persons believe that the Archdiocese may be liable should carefully read this notice.

**YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS,  
INCLUDING WHETHER YOU SHOULD FILE A PROOF OF CLAIM.**

**LAST DATE FOR TIMELY FILING**

The United States Bankruptcy Court for the District of Minnesota entered an order establishing **August 3, 2015**, as the last date for each Sexual Abuse Claimant to timely file a proof of claim. The Claim Filing Deadline and the procedures set forth below for Sexual Abuse Proof of Claim Forms apply to all Sexual Abuse Claims against the dDebtor, based upon alleged acts of sexual abuse occurring prior to January 16, 2015.



### **WHO SHOULD FILE**

If you believe that you have a Sexual Abuse Claim, you should file a Sexual Abuse Proof of Claim to maintain and preserve any claims that you have against the debtor. Even if you have already filed a lawsuit against the debtor alleging sexual abuse prior to January 16, 2015, you should still file a Sexual Abuse Proof of Claim Form to maintain and preserve your rights in the debtor's Chapter 11 case.

### **WHO SHOULD NOT FILE**

You should not file a Sexual Abuse Proof of Claim Form if:

Your Sexual Abuse Claim has already been paid in full;

You do not have a claim against the debtor.

### **WHAT TO FILE**

**FILE A SEXUAL ABUSE PROOF OF CLAIM FORM, A COPY OF WHICH IS ENCLOSED. YOU MAY ALSO OBTAIN A COPY OF THE SEXUAL ABUSE PROOF OF CLAIM FORM BY FOLLOWING THE INSTRUCTIONS BELOW:**

### **PROCEDURES FOR FILING A SEXUAL ABUSE PROOF OF CLAIM FORM**

To file a Sexual Abuse Proof of Claim Form, take the following steps:

Fill out the Sexual Abuse Proof of Claim Form in its entirety.

For additional copies of the Sexual Abuse Proof of Claim Form: (a) photocopy the Sexual Abuse Proof of Claim Form; (b) contact the debtor between the hours of 9:00 a.m. and 5:00 p.m. (prevailing Central Time), Monday through Friday; (c) visit the debtor's website at: <http://information.archspm.org/>; or (d) visit the website of United States Bankruptcy Court for the District of Minnesota at <http://www.mnb.uscourts.gov/>

**Please note that the Court's Clerk staff is not permitted to give legal advice. You should consult your own attorney for assistance regarding any such inquiries.**

Return the completed original Sexual Abuse Proof of Claim Form to the U.S. Bankruptcy Court Clerk at the address set forth below by the Claim Filing Deadline. Sexual Abuse Proof of Claim Forms will be deemed timely filed only if they are **actually received** by the Clerk of Court by **August 3, 2015**.

If you are returning a Sexual Abuse Proof of Claim Form by mail, allow sufficient mailing time so that the Sexual Abuse Proof of Claim Form is received on or before **August 3, 2015**. Sexual Abuse Proof of Claim Forms that are postmarked before that date, *i.e.*, the Claim Filing Deadline, but which are received by the Clerk of the Court after the Claim Filing Deadline, will be considered tardy.

Sexual Abuse Proof of Claim Forms should be delivered to the following address:

Clerk of Court  
Attention: B. Montez  
U.S. Bankruptcy Court District of Minnesota  
200 Warren E. Burger Federal Building and United States Courthouse  
316 North Robert Street  
St. Paul, MN 55101

**CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM**

There may be consequences for failing to file a claim. Please consult your attorney.

**CONFIDENTIALITY**

Filed Sexual Abuse Proof of Claim Forms will remain confidential in this bankruptcy case, unless you elect otherwise in Part 1 of the Sexual Abuse Proof of Claim Form. Therefore, the Sexual Abuse Proof of Claim Form that you file will not be available to the general public, but will be kept confidential, except that information will be provided to the debtor, the United States Trustee for the District of Minnesota, the debtor's insurers, attorneys for the official committee of unsecured creditors and its members, any future claims representative appointed under a plan of reorganization, any settlement trustee appointed to administer payments to Sexual Abuse Claimants, prison authorities for incarcerated Sexual Abuse Claimants and such other persons as the court determines should have the information in order to evaluate the Sexual Abuse Claim, all of whom will agree to keep the information provided by you confidential.

Dated:

**Exhibit D – Publication Notice**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

In re: The Archdiocese of Saint Paul and Minneapolis  
Case No. 15-30125

**YOU MAY HAVE A CLAIM AGAINST  
THE ARCHDIOCESE OF SAINT PAUL AND MINNEAPOLIS**

On January 16, 2015, The Archdiocese of Saint Paul and Minneapolis filed for protection under Chapter 11 of Title 11 of the United States Code.

**The last day to file a SEXUAL ABUSE CLAIM, GENERAL CLAIM, or GOVERNMENT CLAIM against the Debtor is August 3, 2015.**

- If you were sexually abused by any person connected with the debtor, then you must file a claim by August 3, 2015. Sexual abuse, as used in this notice, includes molestation, rape, undue familiarity, sexually-related physical, psychological or emotional harm, or contacts or interactions of a sexual nature between a child and an adult, or a non-consenting adult and another adult.
- If you are a person, entity, or Governmental Unit (as defined by Bankruptcy Code § 101(27)), and claim any right to payment or to an equitable remedy for breach of performance if such breach gives rise to a right to payment, then you must file a claim by August 3, 2015.

**YOU MUST ACT NOW TO PRESERVE YOUR RIGHTS**

For more information on how to obtain and file a proof of claim and associated documents please: (a) visit the debtor's website at <http://information.archspm.org/>; (b) visit the website of the U.S. Bankruptcy Court for the District of Minnesota at <http://www.mnb.uscourts.gov>; (c) call the Debtor's toll-free hotline at \_\_\_\_\_; or (d) call the Official Committee of Unsecured Creditors appointed in this case at \_\_\_\_\_.